

## ASHBY & GEDDES

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May 31, 2006

### VIA E-FILE AND HAND DELIVERY

Honorable Joseph J. Farnan, Jr.  
United States District Court  
District of Delaware  
J. Caleb Boggs Federal Building  
844 N. King Street  
Room 4124, Lockbox 27  
Wilmington, Delaware 19801

• <i>Wells Fargo Bank N.A. v. Royal</i> , Case No. 02-1294-JJF;
• <i>Charles A. Stanziale, Jr., Chapter 7 Trustee of Student Finance Corp. v. Pepper Hamilton, et al.</i> , Case No. 04-1551-JJF;
• <i>Charles A. Stanziale, Jr., Chapter 7 Trustee of Student Finance Corp. v. McGladrey &amp; Pullen LLP, et al.</i> , Case No. 05-72-JJF; and
• <i>Royal v. Pepper Hamilton, et al.</i> , Case No 05-165-JJF

Dear Judge Farnan:

Pursuant to the Court's Order of May 18, 2006 and Your Honor's comments from the bench at the hearing which occurred the day before, counsel for all parties have met and conferred several times in an attempt to reach consensus regarding case management schedules and a coordinated discovery plan for the four above-referenced cases. This joint letter of counsel identifies the basic areas of disagreement that remain:

1. The parties do not fully agree regarding the extent to which document production has been completed and how that should affect the commencement of depositions.
2. The parties do not fully agree as to when depositions should begin.
3. The parties do not fully agree regarding the extent to which the seven hour deposition limit contained in the Federal Rules should be relaxed in order to facilitate coordinated depositions.
4. The parties do not fully agree regarding an appropriate date range for trial.

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Pursuant to the Court's May 18 Order, the parties will be presenting and/or commenting upon various proposed case management schedules and coordination plans.

Respectfully,

*/s/ Tiffany Geyer Lydon*

Tiffany Geyer Lydon

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